

ZMO LAW PLLC

June 1, 2021

Via ECF

Hon. Sidney H. Stein
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED, p. 2

RE: *U.S. v. Joseph DePaola*, 19 Cr. 833

Dear Judge Stein:

This office represents Joseph DePaola in the above-captioned matter. We write to request a brief, 14-day adjournment of the June 25, 2021 sentencing to July 9, 2021 or any day thereafter convenient to the Court. The government does not object to this request.

Since Mr. DePaola pleaded guilty, our office has been diligently seeking out medical and treatment records from various institutions. We are still waiting for records from two facilities. After several attempts to contact these facilities regarding our outstanding requests, we were told that the records should be provided to us shortly. These records relate to Mr. DePaola's mental and physical condition during and before the events underlying the criminal activity. We believe these records are necessary to our sentencing presentation to the Court on Mr. DePaola's behalf.

Therefore, I respectfully request that the Court grant Mr. DePaola a two-week adjournment of the June 25, 2021 sentencing date to allow our office additional time to obtain and review these outstanding records.

Thank you for your attention to this case.

Very truly yours,

Victoria Nicole Medley

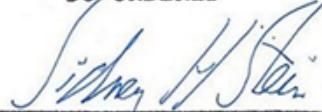
Victoria Nicole Medley

CC: All Counsel (via ECF)

The sentencing is adjourned to July 22, 2021, at 2:30 p.m. Defense submissions are due by July 8, the government submissions are due by July 15, 2021.

Dated: New York, New York
June 1, 2021

SO ORDERED



SIDNEY H. STEIN
U.S.D.J.